



December 3, 2004

Mr. Ron Leach
Toxics & Waste Management Div.
U.S. EPA Region 9 (H-4-4)
75 Hawthorne Avenue
San Francisco, CA 94105

CERTIFIED LETTER
RETURN RECEIPT REQUESTED

Monthly Summary Report Regarding the Month Of November 2004

CP Chemicals, Inc. (formerly Southern California Chemical)
Santa Fe Springs, CA (CAD008488025)
(USEPA Docket No. RCRA-09-89-0001)

Dear Mr. Leach:

This monthly summary report with attached tables constitutes a submittal by CP Chemicals, Inc. ("Respondent") to the United States Environmental Protection Agency ("EPA") in compliance with the terms of the Administrative Order of Consent ("Consent Order") effective December 8, 1988.

This summary addresses Section VI.3.b of the Consent Order. The report describes:
A) The actions taken by or on behalf of Respondent during the previous month;
B) Actions expected to be undertaken during the current month; and C) All results of sample analyses, tests and other data generated or received by Respondent.

Table I lists the actions taken during the current month. Table II lists actions planned for the upcoming month. Please call me at (562) 698-8036 if you have any questions.

Sincerely,

Martin Voss
EHS Manager

Attachments

cc: see the following page



cc: Sharon Wallin
Camp Dresser & McKee, Inc.
18581 Teller Avenue, Suite 200
Irvine, CA 92612

Kathy San Miguel
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630

Florence Gharibian, Branch Chief
Department of Toxic Substances Control
Statewide Compliance Division, Region 3
1011 N. Grandview Avenue
Glendale, CA 91201

Steve Cohen
CP Chemicals, Inc.
One Parker Plaza
Fort Lee, NJ 07024

Table I

The following is a summary of actions taken during the month of November 2004 by Respondent in compliance with the Consent Order.

1. The Fourth Quarter Groundwater Monitoring Report commenced being prepared.
2. Changes to the latest revision of the Site Conceptual Model were submitted to DTSC on September 15, 2004. DTSC appears to be pleased with the latest changes and it appears that the document will be approved. *
3. Phibro-Tech submitted the following work plans and reports to DTSC in 1998 and 2001:
 - a. "Phase II Soil Vapor Survey and SVE Pilot Test Work Plan", dated October 17, 2001
 - b. "Bioventing Treatability Study Work Plan", dated February 16, 1998.
 - c. "Final Soil Vapor Survey Work Plan", dated February 16, 1998
 - d. "Final Phase I corrective Action Soil Vapor Survey Report", dated November 16, 2001
4. Phibro-Tech received comments regarding these work plans and reports in a letter from DTSC dated March 12, 2004. *
5. Phibro-Tech, with the help of CDM, submitted a Generic Soil Vapor Survey work plan to DTSC on June 23, 2004. *
6. A conference call was held on October 26, 2004 with the DTSC. During this call, Phibro-Tech and CDM discussed a tentative plan to begin soil vapor survey work during the first two weeks of December 2004.

*Note: These items did not take place in November but as noted. They are being kept here to retain the latest developments for site corrective action.

Table II

Respondent will take the following actions during the month of December 2004 in compliance with the Consent Order:

1. The Fourth Quarter 2004 Groundwater Monitoring Report will continue being prepared.
2. The Soil Vapor Survey work will most likely begin during the first half of December 2004.